

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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KATHLEEN D'AGOSTINO, et al.,

Plaintiffs,

v.

GOVERNOR DEVAL PATRICK, in his  
official capacity as Governor of the  
Commonwealth of Massachusetts;  
THOMAS L. WEBER, in his official  
capacity as the Director of the Department of  
Early Education and Care; and SERVICE  
EMPLOYEES INTERNATIONAL UNION,  
LOCAL 509,

Defendants.

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Case No. 1:14-CV-11866-GAO

**ASSENTED-TO MOTION BY ALL DEFENDANTS FOR  
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), Defendants Deval Patrick, in his official capacity as Governor of the Commonwealth of Massachusetts; Thomas L. Weber, in his official capacity as Director of the Department of Early Education and Care; and Service Employees International Union, Local 509 ("SEIU") respectfully submit this *assented-to* motion to extend the time to answer or otherwise respond to the Complaint, until and including July 15, 2014.

As grounds for this motion, Defendants state as follows:

1. The Complaint in this matter was filed on April 16, 2014, and served on the Office of the Governor on or about April 22, 2014. It was served on SEIU's offices on or about April 18, 2014. Under Fed. R. Civ. P. 12(a)(1), Defendants' responsive pleadings are due on or about May 9, 2014 (for SEIU) and May 13, 2014 (for Governor Patrick).

2. To accommodate the schedules of counsel, and with agreement of Plaintiffs, Defendants request until July 15, 2014 to answer or otherwise respond to the Complaint.

3. Plaintiffs' counsel, Attorneys Geoffrey Bok and William Messenger, have indicated their assent to the relief requested in this motion.

For the foregoing reasons, Defendants respectfully request an extension of time to answer or otherwise respond to the Complaint, until and including July 15, 2014.

Date: April 28, 2014

Respectfully submitted,

GOVERNOR DEVAL PATRICK, in his  
official capacity as Governor of the  
Commonwealth of Massachusetts, and  
THOMAS L. WEBER, in his official  
capacity as the Director of the Department  
of Early Education and Care,

*By their attorney,*  
MARTHA COAKLEY  
ATTORNEY GENERAL

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/s/ William L. Messenger  
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*Attorneys for Plaintiffs*

**LOCAL RULE 7.1 STATEMENT**

I certify that I have conferred with opposing counsel, Geoffrey R. Bok and William L. Messenger, regarding this motion, and have obtained their assent to the relief sought.

/s/ Tori T. Kim  
Tori T. Kim

**CERTIFICATE OF SERVICE**

I certify that this document filed through the ECF system will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on today's date.

/s/ Tori T. Kim  
Tori T. Kim